

Interagency Coordination Teams

BACKGROUND

Savannah District has coordinated technical aspects of the Savannah Harbor Expansion Project with technical staff of Federal and State resource agencies through a series of Interagency Coordination Teams. The District generally developed those groups around specific natural resources, as follows:

- Wetlands
- Water Quality
- Fisheries
- Sediment Placement
- Groundwater

The agencies involved are those that will have to provide some type of approval or certification to the Project before construction could occur. This includes such agencies as the SC Department of Health and Environmental Control because of the Project's need to obtain a SC water quality certification, and the GA DNR Coastal Resources Division because of the need to obtain concurrence in the District's Coastal Zone Management Consistency Determination. The basic intent of that coordination has been to obtain incremental approval of the technical work that is being conducted on the project.

ISSUE

The present issue is how to coordinate with the Federal and State agencies during the impact identification and mitigation plan development phases of the Project. This coordination would be in addition to the formal review agencies would conduct on the draft and final project reports (GRR/EIS).

ASSUMPTIONS

Agency decision-makers look to their technical staff to develop the basic framework for the agency's position on the acceptability of the SH Expansion Project.

Savannah District will make its own determination of the acceptability of the proposed Project alternatives. We cannot delegate that action to another agency or the public.

PROJECT ACTIONS / APPROACH

The Corps should evaluate the project alternatives using the best technical staff that is qualified for the needed work and available to perform the work within the scheduled timeframes. It should document those analyses to fully explain the tradeoffs that would be occur with implementation of a particular alternative. Corps staff should coordinate with experts in other agencies as needed to develop and obtain additional technical support for our position on the effects of the alternatives and the tradeoffs that would occur.

We intend to share the results of impact evaluation modeling runs as they become available with the other agencies and the public. This will be in summary form, generally consisting of a map and data table.

Once the impact evaluation runs are completed for a specific resource (fisheries, for example), the Corps will review the total information that has been developed and make its preliminary determination of effect and importance. The Corps would then convene a meeting of the appropriate Interagency Coordination Team to discuss the overall and specific findings of the runs. This would be both an information meeting where the Corps shares the results of the impact identification runs, and a decision meeting where we will request concurrence in the process we have followed to identify impacts. We would not expect the agencies to decide on the acceptability of an impact (unless the predictions are that no impact would occur). Since we are (1) using the tools that the agencies have said are appropriate, (2) using those tools in the manner they concurred with, and (3) producing the output formats they previously established to identify impacts to that resource, we will ask the agencies if they agree with the type, extent, and location of impact predicted by the models. It is likely that some agency will request modifications in either model input or output format for some runs. We will like the agencies to agree to the bulk of the model predictions, and handle the modifications as additional sensitivity analyses.

This procedure would occur for the Wetlands, Water Quality, and Fisheries Teams. The Groundwater Team has already seen the modeling results when they reviewed the modeling report. We would share the results with the Sediment Placement Team when the DMMP is complete.

These interagency team meetings would be set up as a series of 1-day events. The meetings for the Wetlands and Fisheries Teams would be held on adjacent days in Savannah. The meeting for the Water Quality Team would be held in Atlanta, like their previous meetings.

After the discussion of expected impacts at the interagency team meetings, the Corps will present the list of mitigation options that was prepared in 2002. Based on the knowledge we provide the agency technical experts on the level of impacts predicted for the various project alternatives, we will ask for guidance on mitigation options that appear unnecessary, inappropriate, or likely to be ineffective. We will also ask for ideas of other mitigation options that they may want us to

consider. We would document the meeting through a Memorandum that we would prepare and provide to each participant and agency branch/division chief.

We would then conduct the model runs needed to develop the mitigation plans. We will attempt to reduce the impacts one resource at a time. This will take some work, as we will need to evaluate different levels/sizes, as well as various mitigation measures. It will likely also require some iteration, as measures that may be effective in reducing impacts to one resource could adversely impact a different resource. We will post the model results on a periodic basis, possibly every week. That would allow us to post a group of runs so that reviewers could see the general structure of what we attempted (increasing flow in a creek by 20%, 50% and 100%, for example).

When we complete our initial development of the mitigation plans, we would convene another meeting of the Interagency Coordination Teams. At this point we would gather all three of the teams together. This would allow the experts in the various fields to see the tradeoffs that may be necessary between their particular resource and the others. We would review the level of impacts predicted by just deepening the navigation channel and then share the results with our mitigation plans included (one for each channel depth). We would explain (for each resource) the various mitigation measures and sizes that we evaluated to reduce the preliminary impacts. This would probably be a 2-day meeting to be held in Savannah.

This meeting would be an information meeting. We would not expect the agency technical expert to speak for the agency on the acceptability of a mitigation plan. We will ask if they believe we have made a good faith effort to reduce the project impacts and whether they have ideas on further mitigation measures that we did not consider. They should be able to state whether they believe the mitigation plans we have developed are clearly insufficient on a technical basis to meet the requirements of their agency and explain why they believe that to be true.

We would then discuss a Monitoring Plan. The plan would be aimed at monitoring the resources that we expect to be impacted. We may propose more intense monitoring of those resources for which the predictive tools have the most uncertainty. We will use the HQUSACE upper limit of 5-years for the post-construction monitoring program. Some monitoring will be proposed prior to construction to provide a baseline for comparison of post-construction results. This may be 1 or 2 years in duration and may vary by resource. The Corps will present a Monitoring Plan and ask the group for their thoughts on the technical adequacy of that plan. For distribution at the meeting, we would develop only one Monitoring Plan -- for the alternative that we believe will be the recommended alternative.

We would document the joint meeting through a Memorandum that we would prepare and provide to each participant and agency branch/division chief.

Once we believe we have reasonable concurrence from the technical experts within the agencies, we would meet with decision-makers in those agencies. This would occur through the stepped process already identified consisting of meeting with (1) the Lead & Cooperating Agencies to obtain the local perspective, (2) the Executive Management Group to obtain the regional perspective, and then (3) the Principals Group to obtain the Washington-level perspective. We would meet with the Corps Regional Integration Team about the same time as meeting with the Lead & Cooperating Agencies. The States would participate in the meeting of the Executive Management Group.